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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

YESENIA LARA, aka YESENIA
NOLASCO VARGAS,

Plaintiff,

v.

UNITED STATES OF AMERICA;
ALEJANDRO MAYORKAS, in his
Official Capacity, Secretary, Department of
Homeland Security; MERRICK
GARLAND, in is Official Capacity,
Attorney General, Department of Justice;
TAE D. JOHNSON, in his Official
Capacity, Acting Director of U.S.
Immigration and Customs Enforcement;
UR MENDOZA JADDOU, in her Official
Capacity, Director of U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 2:21-cv-01845 -JCM-BNW

**Stipulation and Order for Extension
of Time**

(Second Request)

Plaintiff YESENIA LARA, and Defendant UNITED STATES OF AMERICA;
ALEJANDRO MAYORKAS, in his Official Capacity, Secretary, Department of
Homeland Security; MERRICK GARLAND, in is Official Capacity, Attorney General,
Department of Justice; TAE D. JOHNSON, in his Official Capacity, Acting Director of
U.S. Immigration and Customs Enforcement; and UR MENDOZA JADDOU, in her
Official Capacity, Director of U.S. Citizenship and Immigration Services, hereby stipulate

1 and agree that Defendants may have a 28-day extension of time, from December 28, 2021
 2 to January 25, 2022, to respond to Plaintiff's Complaint For Declaratory and Injunctive
 3 Relief (ECF No. 1).

4 Plaintiff is in the process of obtaining her certificate of citizenship, which will cause
 5 this case to be moot. Moreover, defense counsel's calendar is busier than normal with
 6 upcoming hearings and multiple filing deadlines in several cases, including two before the
 7 Ninth Circuit. Under the circumstances, good cause exists to extend the deadline for
 8 Defendants to respond to Plaintiff's Complaint For Declaratory and Injunctive Relief. *See*
 9 Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the
 10 court may, *for good cause*, extend the time...with or without motion or notice if the court
 11 acts, or if a request is made, before the original time or its extension expires[.]") (emphasis
 12 added).

13 This is Defendants' second request for an extension of time. *See* LR IA 6-1(a) (must
 14 advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this
 15 extension request, and he has advised that he does not oppose the request. This stipulation
 16 is made in good faith and not for the purpose of undue delay.

17 DATED: December 28, 2021

18 CHRISTOPHER CHIOU
 Acting United States Attorney

19
 20 /s/ Xavier Gonzales
 XAVIER GONZALES
 21 Attorney for Plaintiff

22 /s/ Holly A. Vance
 HOLLY A. VANCE
 Assistant U.S. Attorney
 Attorney for Defendant

23 **IT IS SO ORDERED.**

24 Dated: December 29, 2021

25 
 26 UNITED STATES MAGISTRATE JUDGE